

ORIGINAL

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U.S.D.C. Atlanta

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IN THE UNITED STATES DISTRICT COURT

DEC 10 2013

FOR THE NORTHERN DISTRICT OF GEORGIA

JAMES N. HATTEM, Clerk
By: *Angela S. Smith*
Deputy Clerk

GAINESVILLE DIVISION

UNITED STATES OF AMERICA :
: CRIMINAL INDICTMENT
v. :
: NO. 2:11-CR-44-RWS-JCF
RAY H. ADAMS :
SAMUEL J. CRUMP : (SUPERSEDING)

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Conspiracy to Possess and Produce a Biological Toxin
For Use as a Weapon)

1. Beginning on a date unknown to the Grand Jury, but at least as of March 17, 2011, and continuing until November 1, 2011, in the Northern District of Georgia and elsewhere, the defendants, RAY H. ADAMS and SAMUEL J. CRUMP, did combine, conspire, confederate, agree and have a tacit understanding with each other, and others known and unknown to the Grand Jury, to knowingly develop, produce, and possess a biological toxin, that is, ricin, for use as a weapon, in violation of Title 18, United States Code, Section 175(a).

Background

2. It is relevant to the conspiracy that:

3. Throughout the time period alleged in the Indictment, defendants ADAMS and CRUMP attended meetings with others known and unknown to the grand jury to discuss the formation of a covert militia group and to plan, among other activities, armed attacks on

government buildings and federal government employees, including law enforcement agents.

4. During the meetings, the defendants and others known and unknown to the grand jury discussed their willingness to advance the militia group's objectives by assassinating others by various means including the use of biological toxins.

5. Ricin, as used in this Indictment, refers to a highly toxic, naturally occurring protein derived from the plant *Ricinus communis*.

Overt Acts

6. In furtherance of the conspiracy, and in order to effect the purposes and objects thereof, defendants CRUMP and ADAMS and others known and unknown to the grand jury, committed overt acts in the Northern District of Georgia and elsewhere, including but not limited to the following:

7. On or about March 17, 2011, unindicted co-conspirators and others known to the grand jury discussed forming a covert militia group and targeted assassinations of government officials. Meeting participants discussed biological substances that could be used to kill people, including the biological toxin ricin.

8. On or about April 16, 2011, defendant ADAMS met with unindicted co-conspirators and others known to the grand jury to discuss the formation of a covert militia group. Defendant ADAMS suggested attacking government buildings with toxins and killing

government employees.

9. On or about September 17, 2011, defendant CRUMP and others known and unknown to the grand jury discussed defendant CRUMP's plan to produce ten pounds of ricin and disperse the ricin in several cities in the United States. Defendant CRUMP stated that defendant ADAMS would make the ricin.

10. On or about October 6, 2011, defendant CRUMP met with an individual known to the grand jury and discussed his plans for making ricin, including discussing the ingredients and process for making ricin from castor beans.

11. On or about October 15, 2011, defendants CRUMP and ADAMS and others known and unknown to the grand jury, attended a meeting at defendant ADAMS' residence during which defendant ADAMS removed a castor bean from a bin in a storage shed containing other castor beans on defendant ADAMS' property and gave the castor bean to defendant CRUMP. Defendant CRUMP gave the castor bean to an individual known to the grand jury.

12. On or about October 29, 2011, defendant CRUMP told an individual known to the grand jury that lye was the final ingredient he needed to obtain for the production of ricin and discussed his plan to purchase lye.

13. On or about October 29, 2011, defendant ADAMS discussed with an individual known to the grand jury the production of ricin and stated that he needed about one pound of lye to produce ricin.

14. On or about October 29, 2011, an individual known to the grand jury observed a recipe for making ricin in ADAMS' residence.

15. On or about October 29, 2011, defendant CRUMP told a person known to the grand jury that he had a quantity of castor beans at his residence and that he would begin the process of removing the castor beans' shells.

All in violation of Title 18, United States Code, Section 175(a).

COUNT TWO
(Possession of a Biological Toxin For Use as a Weapon)

16. The allegations in paragraphs Two through Fifteen of this Indictment are re-alleged and incorporated by reference as though set forth fully herein.

17. Beginning on a date unknown to the Grand Jury, but at least as of November 1, 2011, in the Northern District of Georgia and elsewhere, the defendants, RAY H. ADAMS and SAMUEL J. CRUMP, aided and abetted by each other and others known and unknown to the Grand Jury, did knowingly acquire, retain and possess a biological toxin, that is, ricin in its naturally occurring environment, that had not been extracted from its natural source, that is, castor beans, for use as a weapon, in violation of Title 18, United States Code, Section 175(a) and Section 2.

COUNT THREE

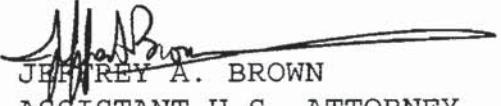
(Attempted Possession of a Biological Toxin For Use as a Weapon)

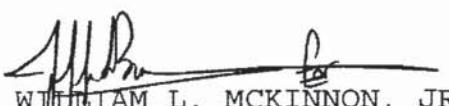
18. The allegations in paragraphs Two through Fifteen of this Indictment are re-alleged and incorporated by reference as though set forth fully herein.

19. Beginning on a date unknown to the Grand Jury, but at least as of November 1, 2011, in the Northern District of Georgia, the defendant, RAY H. ADAMS, did attempt to develop, produce, and possess a biological toxin, that is, ricin, for use as a weapon, in violation of Title 18, United States Code, Section 175(a).

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